

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

ANDREW PERRONG, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CHARLES BARATTA LLC, a New York
limited liability company, SLATER SLATER
SCHULMAN LLP, a New York limited
liability partnership, ARKADY
FREKHTMAN ATTORNEY AT LAW, P.C.
d/b/a FREKHTMAN & ASSOCIATES, a
New York professional corporation,
FLEMING NOLEN & JEZ LLP, a Texas
limited liability partnership, and LAW
OFFICE OF COHEN & JAFFE, LLP, a New
York limited liability partnership

Defendants.

: Civil File No. 2:21-cv-00996-JS-AYS

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**NOTICE OF INTENT TO OPPOSE
PRO HAC VICE APPLICATION
FILED BY AMBROSE W.
WOTORSON, JR., ESQ.**

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Plaintiff provides notice of his intent to oppose the motion for *pro hac vice* admission of Joshua Thomas, Esq. in this action. Mr. Thomas filed his motion on July 20, 2021 (ECF No. 25). Plaintiff intends to file a response in opposition to the motion on or by August 3, 2021, two weeks from the filing of the *pro hac vice* motion.

Dated: July 20, 2021

Respectfully submitted,

/s/ Avi R. Kaufman

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